



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN -9 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. John J. Henningson
Product Steward (Americas)
W.R. Grace & Co.
EHS Department
62 Whittemore Avenue
Cambridge, Massachusetts 02140-1692

Dear Mr. Henningson:

Thank you for your letters dated September 6, 2002 and August 13, 2003 to the U.S. Environmental Protection Agency (EPA) regarding the EPA's High Production Volume (HPV) Challenge Program. We apologize for the delay in responding.

Your letters request that Orphan Chemical Formic Acid Compound with 2,2', 2''-nitrioltris (ethanol), CAS #24794-58-9 be designated as a "no longer HPV" chemical.

As you know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website (www.epa.gov/chemrtk) in March 1999. Based on our review of the most up-to-date Inventory Update Rule (IUR) reporting for years 1998 and 2002, EPA has determined that Orphan Chemical Formic Acid Compound with 2,2', 2''-nitrioltris (ethanol), CAS #24794-58-9 **does not meet** the no longer HPV criteria.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at tsc hotline@epa.gov.

Sincerely,

Wardner G. Penberthy
Acting Director
Chemical Control Division

cc: AR201